ABA Section of International Law
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Russia and Eurasia Committee

Legislation Updates and News

January-June 2016

Dear Committee Members:

We would like to start this edition of the Russia and Eurasia Committee Newsletter with congratulations on several recent accomplishments by our Committee which demonstrate not only our great teamwork but also the growing stature of the Committee.

At the Spring Meeting in New York, the Committee presented two panels: "Are the Long Arms Growing Legs? The Expansion of Extraterritorial Jurisdiction" and "Beyond the Oligarchs: A Survey of Legal Obstacles to High-Tech Startups in Russia." Both panels were a great success and attracted about 80 attendees. At the Spring Meeting, we also had the largest in-person meeting of the Committee leadership organized by James Hitch.

On May 10, the first seminar in a series of the Committee's programs on U.S. and Russian business relations took place in Philadelphia. More than 50 people attended that program which received very positive feedback from both participants and attendees. In this edition, Elena Beier and Michael Shapiro provide a report about this event.

In this edition of the Newsletter, you will also learn about a broad range of other topics from the interplay between Russian bankruptcy and American fraudulent transfer law to Russia's interests in the Arctic.

Two articles in this edition address highly debated topics regarding dispute resolution: reform of the Russian arbitration system and a recent judgment of the Hague District Court regarding the Yukos case. These discussions are very timely in advance of the ABA Moscow Dispute Resolution Conference which will take place in September.

Corporate compliance, as always, remains a hot topic in Eurasia. In this issue of the Newsletter, you will learn about legal developments and enforcement trends in combating corporate bribery in Russia.

Finally, we congratulate our Committee members on their joint comparative publication about the U.S. and Russian patent systems, titled "U.S. and Russian Patent Systems: Recent Legislative Changes and Their Significance for the Intellectual Property Rights Protection." This is yet another brilliant example of our members' cooperation and using the Committee as a platform for promoting dialogue between our countries.

We would like to thank our contributors to the current edition: Elena Beier, Beier & Partners; Maria Grechishkina, Marks & Sokolov LLC; Roman Buzko, Buzko & Partners; Jurjen de Korte, Eversheds; Kimberly Reed, Reed International Law & Consulting; Pamela Marie Egan, Rimon, P.C.; and Dmitry Lysenko, Baker & McKenzie – CIS, Limited. Our fellow editorial board members, Anastasia Kovalevskaya, Baker & McKenzie – CIS, Limited; Michael Shapiro, Bazelon Less & Feldman, P.C.; and Vladislav Zabrodin, Capital Legal Services, also contributed materials.

We encourage Committee members from all Eurasian countries to participate in the upcoming editions!

Anastasia Kovalevskaya
Michael Shapiro
Vladislav Zabrodin

U.S.-Russian Business and Legal Forums and Brown Bag Lunches Initiative
(Elena Beier, Beier & Partners; Michael Shapiro, Bazelon Less & Feldman, P.C.)

The first seminar in the series on U.S. and Russian business relations took place in Philadelphia on May 10. Titled "U.S.-Russia Business Relations: Challenges and Opportunities in the New Norm," the event was hosted by Dechert LLP and co-sponsored by several Section of International Law Committees, the U.S.-Russia Business Council, and a number of law firms.

The program addressed legal, business, and policy aspects of doing business and investing in today's Russia. The panelists discussed a broad range of topics, including the macroeconomic outlook for the Russian economy and opportunities for investors in the current geopolitical climate, changes in the Russian IP infrastructure, challenges facing technology and innovation development in Russia and opportunities for cooperation between the United States and Russia in these areas, legal and financial issues affecting the Russian market, the future of economic sanctions, effect of data localization law on the U.S. companies, investment treaty arbitrations, and enforcement of foreign arbitral and court awards in Russia.

The distinguished program speakers included a number of leading experts on U.S.-Russia business relations: Dan Russell (USRBC), J.P. Natkin (Macro-Advisory Ltd.), Tom Thomson (T. Thomson and Associates, L.L.C.), Dmitry Akhanov (Rusnano USA, Inc.), Adrian Erlinger (American Councils for International Education), Randy Bregman (Dentons), Eli Feldman (EPAM Systems), and Bruce Marks (Marks & Sokolov, LLC). Laura Brank (Dechert LLP), Elena Beier (Beier & Partners), and Maxim Voltchenko (Duane Morris LLP) moderated the panels. The Committee Vice Chair Michael Shapiro delivered opening and closing remarks.

Among guests at the program were investors, in-house counsel, experts on U.S.-Russia legal and business relations, representatives of various academic institutions, and journalists.

The Philadelphia program has received universally positive feedback from the participants and the audience. Its success illustrates a collaborative effort by the Section of International Law, Russia and Eurasia Committee, organizing committee of the program, and a number of partnering organizations. Overall, this was an outstanding event that served as a platform for exchanging ideas on various legal and business topics and contributed to a constructive dialogue between the United States and Russia.

We are looking forward to the next seminar in the series which is expected to take place in St. Petersburg on June 16, 2016.

Reform of the Russian Arbitration System

(Maria Grechishkina, Marks & Sokolov LLC)

The recently enacted reform of the arbitration system will significantly affect both domestic and international arbitration in Russia. It is comprised of two newly enacted federal laws:

- the Federal Law No. 382-FZ "On Arbitration in the Russian Federation," dated December 29, 2015; and
- the Federal Law No. 409-FZ "On Amending Certain Legislative Acts of the Russian Federation and Considering Paragraph 3 Part 1 Article 6 of the Federal Law 'On Self-Regulating Organizations' as Having Lost Its Force Due to the Adoption of the Federal Law 'On Arbitration in the Russian Federation'," dated December 29, 2015.

The Federal Law No. 382-FZ replaces the current law on domestic arbitration, and the Federal Law No. 409-FZ brings existing laws, including the Law on International Commercial Arbitration (the "ICA Law"), the Arbitrazh Procedural Code, and the Civil Procedural Code, into conformity with the new provisions. Both laws will enter into effect on September 1, 2016, with some provisions taking effect later.

While updating the general arbitration framework, the reform significantly affects the status of *ad hoc* arbitrations and streamlines important issues pertaining to arbitrability of corporate disputes.

Changes to the Scope of the ICA Law

Under the current ICA Law, parties may generally refer the following types of disputes to international commercial arbitration: contractual or other civil-law disputes arising from their international economic activity where at least one of the parties has a commercial enterprise abroad; disputes between enterprises with foreign investments, international associations and organizations established in Russia, disputes between the participants of such entities and their disputes with other parties.

The arbitration reform extends this list to include disputes where a substantial part of the obligations arising from the relationships between the parties is to be performed abroad, or where the subject matter of the dispute is most closely connected with a foreign state. It also extends the scope of disputes pertaining to international investment, which may be made subject to the international commercial arbitration.

However, the ICA Law still does not allow parties to apply the regime of international commercial arbitration by mere choice of a seat. International arbitration institutions, such as the International Commercial Arbitration Court (the "ICAC") and the Maritime Arbitration Commission (the "MAC") at the Chamber of Commerce and Industry of the Russian Federation, may consider domestic disputes, but examination of such disputes will be governed by domestic arbitration law, not the ICA Law.

Institutional Arbitrations

The law introduces new rules for creation and functioning of arbitration institutions. Such institutions may only be created under the auspices of non-commercial organizations and are required to obtain a permission from the Russian Government. The law exempts the ICAC and the MAC from this requirement. Arbitration awards rendered by arbitration institutions without the required permission will be treated as decisions returned by an *ad hoc* arbitration.

Ad Hoc Arbitration

Ad hoc arbitrations will be subject to a number of limitations, among which are the following:

1. The parties will not be able to waive their right to petition to the Russian court in connection with a recusal of an arbitrator, a termination of an arbitrator due to inability to perform his or her duties, or in connection with challenging a jurisdictional ruling or revocation of an award;
2. Assistance from the Russian court in collecting evidence will not be available;
3. *Ad hoc* arbitrations will not be able to hear corporate disputes.

Changes Pertaining to Resolution of Corporate Disputes

The new law generally provides which corporate disputes are arbitrable. Some of the corporate disputes are subject to additional requirements in order to be arbitrable.

Arbitration agreements on arbitrable corporate disputes may be entered into after February 2017. Subject to the requirements envisaged by the new law, the arbitration agreement can be part of the Russian company's charter binding on all shareholders.

Importantly, corporate disputes may only be considered by institutional arbitration.

Text of the Law:

Federal Law No. 382-FZ "On Arbitration in the Russian Federation," dated December 29, 2015 (Russian);

Federal Law No. 409-FZ "On Amending Certain Legislative Acts of the Russian Federation and Considering Paragraph 3 Part 1 Article 6 of the Federal Law 'On Self-Regulating Organizations' as Having Lost Its Force Due to the Adoption of the Federal Law 'On Arbitration in the Russian Federation'," dated December 29, 2015 (Russian).

Selected Resources and Publications:

Russian Law Journal: Dmitry Maleshin, Chief Editor's Note on Arbitration Reform in Russia, 4(1) RLJ (2016) (English);

Debevoise & Plimpton LLP: Laws on Arbitration Reform in Russia Adopted (English);

Kluwer Arbitration Blog: The Russian Arbitration Reform Reached Its New Development (English);

Freshfields Bruckhaus Deringer: Russian Arbitration Law Reform (English).

Russian Corporate Bribery Act – Recent Developments

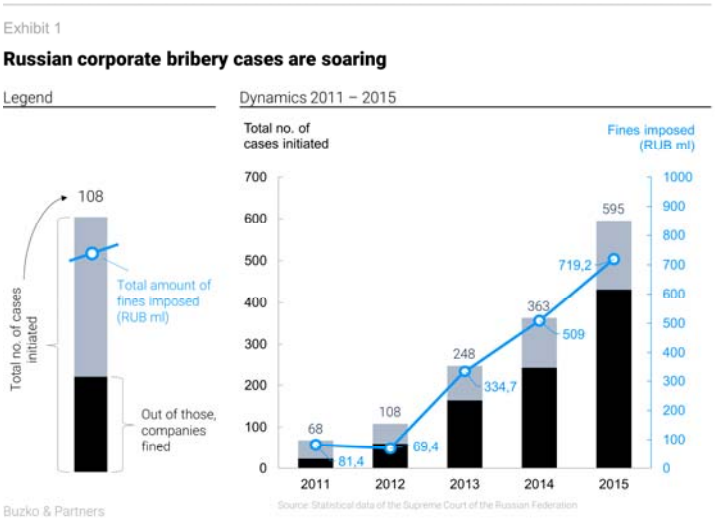
(Roman Buzko, Buzko & Partners)

It has been several years since Russia joined the worldwide trend of combating corporate bribery. It all started with the ratification of UN Convention against Corruption back in 2006, but the real milestone was not until the end of 2008, when corporate bribery became an administrative offence under Article 19.28 of the Code of Administrative Offences (the "Russian Corporate Bribery Act" or the "RCBA"). The RCBA is similar to the most well-known acts in this area, namely, the U.S. Foreign Corrupt Practices Act (the "FCPA") and the UK Bribery Act (the "UKBA"). In contrast to them, however, in our view the RCBA is still mainly targeting small and medium-sized enterprises.

Recently, there have been several interesting developments. Firstly, the Supreme Court of Russia has revealed its most recent comprehensive statistical data on the application of the RCBA. Secondly, the scope of the RCBA has been expanded to apply extraterritorially. Thirdly, recent enforcement practice has confirmed that a prudent company may avoid liability if it proves that it has taken all "adequate measures" to prevent corruption.

1. Statistical Data

The Supreme Court of Russia keeps the record of completed investigations and the total amount of fines imposed, and has recently published the data for 2015.



The longitudinal analysis of the data for five years ending in 2015 reveals the following interesting facts:

- There is a clear upward trend in the amount of fines imposed, with an average growth rate of well over 50%;
- The average fine is in the range of RUB 1-3 million and appears to gravitate towards the minimum amount of RUB 1 million, which is far from the RUB 100 million minimum stipulated in the RCBA for a corporate bribery exceeding RUB 20 million;
- Investigations result in imposition of the administrative punishment in approximately 60% of the cases;
- No information has been published on investigations over Russian companies bribing foreign officials or corporate officers.

2. Extraterritorial Application

In March 2016, the Russian Parliament expanded the scope of the RCBA. The Federal Law No. 64-FZ "On Amending the Code of Administrative Offences of the Russian Federation," dated March 9, 2016, made it possible to subject a legal entity to liability for committing a corporate bribery abroad. The law envisions this may be possible if:

- a corporate bribery is directed against the interests of the Russian Federation; and
- in cases specified by international treaties to which the Russian Federation is a party, a legal entity has not been held liable for a corporate bribery by a foreign state.

If a foreign legal entity commits a corporate bribery abroad and such corporate bribery is directed against the interests of the Russian Federation, such legal entity may be held liable under the RCBA on the same grounds as a Russian legal entity.

It remains to be seen how broadly the term "interests of the Russian Federation" will be interpreted by the Russian enforcement authorities, but it is now clear that the absence of legal presence within Russia is no defense under the new law.

3. Safeguard Measures

In contrast to its foreign siblings, the RCBA does not specifically provide for the so-called "adequate procedures" defense, under which a company may avoid liability by showing that, despite a particular case of bribery, it nevertheless had adequate procedures in place to prevent persons associated with it from bribing.

However, since administrative liability in Russia is fault-based, such a defense can be derived from the general principles of corporate guilt, i.e. the failure to take all necessary measures within one's power to comply with applicable norms and rules.

Certain *de minimis* measures (internal policies, workshops for employees, etc.) are already prescribed in Article 13.3 of the Federal Law No. 273-FZ "On Combatting Corruption," dated December 25, 2008, and failure to adopt such measures signals actionable misconduct. Conversely, having such measures in place would allow for "adequate procedures" defense. Prudent companies should be proactive in adopting prescribed measures to have this card ready up their sleeves.

Text of the Law:

Federal Law No. 64-FZ "On Amending the Code of Administrative Offences of the Russian Federation," dated March 9, 2016 (Russian).

Selected Resources and Publications:

PwC: Doing the Right Thing. Anti-Bribery and Corruption Compliance Research in Russia – 2015 (English).

Interplay Between Russian Bankruptcy and American Fraudulent Transfer Law

(Pamela Marie Egan, Rimon, P.C.)

This article describes two major differences between Russian bankruptcy and American bankruptcy: (1) the initial treatment of creditors' claims and the burden of proof to establish them; and (2) the ability of creditors to sue a debtor in foreign courts, despite the pendency of the Russian bankruptcy. The implication is that a Russian bankruptcy will not prevent a creditor from recovering property of the debtor located in the United States. In fact, as set forth below, the Russian bankruptcy can even help the creditor.

In an American bankruptcy, claims are *prima facie* valid if they meet certain minimal formalities. After the claim is filed, the claim is automatically entered in the claims registry. If the debtor does not object, the claim is allowed. In contrast, in a Russian bankruptcy, the creditor has to establish grounds for the claim, before it may be entered in the claims registry. The commercial (arbitrazh) court will review the claim, even if no objection has been asserted.

While the Russian arbitrazh court's supervision and review of bankruptcy claims is broader than that of an American bankruptcy court, its jurisdiction is more limited than that of an American bankruptcy court. An American bankruptcy court asserts worldwide jurisdiction over all property of the debtor. *See, e.g., In re Yukos Oil Co.,* 321 B.R. 396, 406 (Bankr. S.D. Tex. 2005):

> Congress intended to grant comprehensive jurisdiction to the bankruptcy courts so that they might deal efficiently and expeditiously with all matters connected with the bankruptcy estate. This broad grant of jurisdiction extends to extraterritorial application of the Bankruptcy Code as it applies to property of the bankruptcy estate.

Russian courts have a far different view. The bankruptcy case of the Vladivostok Base of Trawl and Reefer Fleet (the "VBTRF") filed in the Russian Far East region provides a good example. A group of creditors sued the debtor, the VBTRF, in courts in England, South Korea, and Singapore, notwithstanding the pendency of the bankruptcy in Russia. Other creditors moved the commercial court to enjoin these actions on the ground that all matters concerning the debtor should be resolved within the Russian bankruptcy case. The Russian court refused, holding that Russian commercial courts "do not have the right to deprive a person of the right to protection in the forum of his choice, including by resource to the courts of other states."

These aspects of Russian bankruptcy law provide a powerful remedy to a creditor under U.S. law if the Russian debtor has "parked" assets in the United States. Under American law, even a good faith transferee can be required to deliver property to a creditor, if the transferee received the property from an insolvent debtor without paying reasonably equivalent consideration. In other words, "gifts" by an insolvent can be avoided.

If a Russian debtor files bankruptcy in Russia, but also "parks" property with someone in the United States, the creditors of the Russian debtor can sue the property holder in the U.S. to recover the property. Moreover, if the creditor's claim has been entered in the registry of the Russian bankruptcy, then the creditor has a strong argument that this decision of the Russian commercial court should be accorded comity. If the commercial court's decision is accepted as a matter of comity, for which there is ample precedent, then the creditor would not have to sue the debtor in the United States to establish the claim, but instead, can rely on the decision of the Russian commercial court. The creditor needs only to sue the transferee located in the United States. Thus, the filing of a Russian bankruptcy can significantly help a creditor, who discovers assets of the Russian debtor in the United States.

The blue links set forth above will take the reader to the relevant authorities.

Yukos Award Set aside by Dutch Court

(Jurjen de Korte, Eversheds)

On April 20, 2016 the Hague District Court set aside the USD 50 billion Yukos arbitral awards, holding that the Russian Federation is not bound by the arbitration provision of the Energy Charter Treaty (the "ECT").

In 2005, several Yukos investors claimed to have been expropriated of their investments in the Yukos Oil Company by the Russian Federation as a result of substantial tax (re)assessments that ultimately led to the bankruptcy of the company. Arbitrations were initiated against Russia on the basis of the ECT in which the investors sought compensation for their damages. The arbitration was at The Hague in the Netherlands.

The Russian Federation disputed jurisdiction on the grounds that it was not bound by the ECT as it had not ratified the treaty and a provisional application of the ECT could only be allowed insofar as the ECT provisions would not violate the Russian law. The ECT arbitration provision, Article 26, was considered to violate the Russian law. The investors took the position that the ECT as a whole applied provisionally and that provisional application of a treaty *per se* is not contrary to the Russian law. According to the investors, the arbitral tribunal could assume jurisdiction on that basis.

In 2009, the arbitral tribunal issued interim rulings confirming its jurisdiction to decide the expropriation claims. The arbitral tribunal held that the ECT applied provisionally to the Russian Federation during the relevant period. The arbitral tribunal took the view that the Russian law does not prohibit provisional application of the treaty as a whole. The arbitration proceeded, and the arbitral tribunal subsequently awarded the investors more than USD 50 billion in damages.

The Russian Federation then sought to set aside the interim rulings on jurisdiction and the final damages awards before the Dutch courts. Its main argument was the alleged absence of a valid arbitration agreement.

To assess whether or not a valid arbitration agreement existed, the Hague District Court, contrary to the approach of the arbitral tribunal, held that Article 45(1) of the ECT can apply provisionally to a signatory state only in relation to the provisions that do not violate the laws of that signatory state. The District Court further held that provisional application of the arbitration provision of the ECT violates the Russian Constitution. It reasoned that under the Russian Constitution the executive branch cannot cause the Russian Federation to become provisionally bound to arbitrate investment disputes if such act and the associated loss of sovereignty has not been ratified by the Russian legislature. Consequently, the District Court reasoned that the arbitral tribunal lacked jurisdiction, and the awards were set aside. The Dutch court also ordered the former Yukos shareholders to pay the costs of the set-aside proceeding.

The judgment of the Hague District Court is subject to appeal to the Court of Appeal in The Hague. Representatives of the former Yukos shareholders have already announced that they will appeal the judgment of the Court.

Text of the Judgment:

Court-Approved Translation of the Hague District Court Judgment (English).

Selected Resources and Publications:

Kluwer Arbitration Blog: Yukos Awards Set aside by the Hague District Court (English);

Global Arbitration Review: US $50 Billion Yukos Awards Set aside in The Hague (English);

Investment Treaty News: Yukos v. Russia: Issues and Legal Reasoning Behind US $50 Billion Awards (English).

Russia's Interests in the Arctic Lead to Military Build-up

(Kimberly Reed, Reed International Law & Consulting)

President Vladimir Putin has made it clear that he views the Arctic as a central piece of Russia's military and defense strategy in the immediate and long-term future. In December 2014, Putin announced a new military doctrine that placed the Arctic on the list of Russian "spheres of influence" for the first time, mirroring Russia's maritime strategy that aims for dominion over the near Arctic. Russia's interest in the Arctic is long-standing, as virtually its entire northern border sits above the Arctic Circle. But the reasons underlying its new military build-up in the Arctic stem directly from the fact that the melting of Arctic sea ice due to global warming has made the Arctic a potentially lucrative prize of great strategic value.

International law dictates that countries have exclusive use of the resources in and under the ocean within 200 nautical miles of their shores (i.e., within their "exclusive economic zone"). Under the ice of the Arctic sits an estimated 30% of the world's untapped natural gas, up to 13% of undiscovered oil reserves, and 20% of the liquefied natural gas on Earth. Russia generates 20% of its GDP from the Arctic, mostly from oil and gas, and largely through joint ventures with foreign companies. However, the vast resources of the Arctic have been difficult to reach under the deep ice, and generally have required development of new pipelines or other transport means to carry the product to market.

The rapid melting of Arctic sea ice is rendering extraction and transportation of these resources more viable, and causing the Northern Sea Route, which runs from Vladivostok, north through the Bering Sea, and along Russia's northern border and Arctic archipelagos to Scandinavia and other European ports, to be navigable during the summer months. Future warming may render the route passable year-round.

Eight countries have territory above the Arctic Circle: the United States, Canada, Russia, Norway, Denmark, Iceland, Finland, and Sweden. All are members of the Arctic Council, a consensus forum that promotes cooperation, coordination, and interaction among the "Arctic states" on common issues such as the environment, sustainable economic development, protection of indigenous peoples, and transportation. The Council's mandate explicitly excludes military security. Of the seven Arctic Council countries besides Russia, five are members of NATO and the other two (Finland and Sweden) are western-facing democracies friendly with NATO. Russia's paranoia that the West is perpetually plotting against it makes Russia adamant about ruling what it views as its "half" of the Arctic, i.e., from its northern borders to the North Pole.

Over the last three years, President Putin has ordered the quick rehabilitation and reactivation of many old Soviet-era military bases in the Arctic. The Arctic island of Novaya Zemlya, northeast of Murmansk, recently became the headquarters for part of the Russian Northern Fleet, which comprises 2/3 of the entire Russian Navy, and the island's airstrip is being refurbished to accommodate modern Russian fighter jets. A giant new military base is under construction on Kotelny Island and six other bases have been constructed or remade in the Arctic. As of 2015, the new bases included 16 deep-water ports, 13 airfields, and advanced S-400 long-range surface-to-air missiles and supersonic anti-ship missiles. In addition, Russia has a new 6,000-soldier military group in the Murmansk area and the Yamal-Nenets autonomous region. Cutting-edge radar and ground guidance systems are planned for Franz Josef Land, Wrangel Island, and Cape Schmidt.

In 2014, in Russia's largest full-scale military exercise since the fall of the USSR, Russian military units performed combat training missions in the Arctic, prominently deploying Pantsir-S (air defense) and Iskander-M (theater ballistic missile) weapon systems, among others. Further, the Northern Fleet's Independent Marine Infantry Brigade underwent intensive training in the Arctic throughout 2015. In 2015, military experts estimated that Russia had 56 military aircraft and 122 helicopters in the Arctic. The Russian Ministry of Defense also announced that some of the 50 new MiG-31BM Foxhound interceptors to be built by 2019 will be deployed in the Arctic.

The potential value of Arctic resources and the length of Russia's northern border could account for this military activity being nothing more than prudent defensive, protectionist measures. However, these actions have rattled Russia's neighbors like Finland and Norway, and given all of the Arctic nations reason to be wary and watchful.

Selected Resources and Publications:

Unofficial Translation of the Russian Federation Policy for the Arctic till 2020 (English);

Arctic Council: Russian Federation County Profile (English).

Russia's Militarization of the Arctic
Source: Business Insider (December 7, 2015)

Comparative Publication on the U.S. and Russian Patent Systems

The Russia and Eurasia Committee members, Elena Beier and Anne Wright Fiero, recently published an article which compares the U.S. and Russian patent systems, outlines recent reforms in both countries concerning the patent regulation, and discusses the statutory barriers to both patent rights and patent litigation by non-practicing entities (so-called "patent trolls") in Russia and the United States.

The article also discusses the importance of the work of the Innovation Working Group (the "IWG") that was part of the U.S.-Russia Bi-lateral Presidential Commission (the "Commission"). James Hitch, a current member of the Committee's steering group, was the U.S. Co-Chair of the Legal Frameworks Subgroup of the IWG. Working with the IWG, Pamela Egan, currently Co-Chair of the Committee, and Mr. Hitch obtained a grant from the U.S. Department of State to conduct a survey in Russia of entrepreneurs regarding legal obstacles to innovation in Russia. After the IWG's work was suspended, the Committee continued the survey and the analysis of its results.

The publication in *The Intellectual Property Magazine* is an adaption and update of the original article published in *The John Marshall Review of Intellectual Property Law* in 2015.

The publication makes the material accessible to the Russian audience, including universities, practicing lawyers, and business people dealing with patent law in both countries. An overview of the article is available here.

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We appreciate your comments and suggestions regarding the contents of this Newsletter.

If you would like to contribute or have any questions, please feel free to contact editorial board members: Anastasia Kovalevskaya, Michael Shapiro, Vladislav Zabrodin.

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The Russia and Eurasia Committee of the American Bar Association Section of International Law concentrates on the Eurasian region encompassing Russia, Ukraine, Moldova, Belarus, Kazakhstan, Uzbekistan, Armenia, Kyrgyzstan, Turkmenistan, Azerbaijan, Georgia, and Tajikistan.

Co-Chairs:
Benedict Kirchner,
Pamela Egan

For more information, including access to the Committee's publications and other resources, please visit the Committee's website.